

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,	:	CIVIL ACTION NO.: 14-CV-3916
:	:	
Plaintiff,	:	
	:	
v.	:	<b>VERIFIED STATEMENT</b>
	:	<b>: OF INTEREST</b>
ALL RIGHT, TITLE AND INTEREST IN	:	
REAL PROPERTY AND APPURTANCES	:	
LOCATED AT 191 MERRITT AVENUE	:	
BERGENFIELD, NEW JERSEY 07621	:	
AND ALL PROCEEDS TRACEABLE	:	
THERE TO	:	
Defendant In Rem	:	

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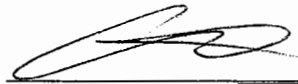
**CLAIMANTS WAN CHING YEUNG & HAIJIN LU'S VERIFIED CLAIM**

**OF INTEREST**

1. Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimant, Wan Ching Yeung and Haijin Lu, hereby file this verified claim and asserts its interest and right in the Defendant *in rem* in this action.
2. Wan Ching Yeung and Haijin Lu have a claim to, interest in, and right to the real property to be seized by the United States pursuant to the "Verified Complaint for Forfeiture *In Rem*" filed in this action under Title 18, United States Code, Sections 985 and 31 S 5317(c) on June 2, 2014 for \$442,500.00, the price they purchased on or about October 12, 2004. (Referred to as the "Defendant Property").
3. The basis of Wan Ching Yeung and Haijin Lu's interest in the property is as follows:

- a. Claimant Wan Ching Yeung and Haijin Lu are citizens of the United States. As part of Claimant's ordinary course of business, it purchased the house as their family residence on or about October 12, 2004 from Frank DeCarlo and Nadine DeCarlo, husband and wife.
  - b. During the ordinary course of business claimants lawfully borrowed the money from Hudson City Savings Bank in order to purchase the property in 2004. As a result, claimants have to make monthly mortgage payment to Hudson City Savings Bank. They paid the mortgage by drawing the money they made from their restaurant business on a monthly basis by purchasing money order from the U.S. post office. They have paid their federal and state sales and income taxes for the money they made from their restaurant business operation.
4. Wan Ching Yeung and Haijin Lu are the lawful owners of the Defendant Property. Wan Ching Yeung and Haijin Lu did not have any knowledge of, let alone participate in, any alleged money laundering or illegal activities alleged in the complaint. As such, Wan Ching Yeung and Haijin Lu demand that the court dismiss this action or the government withdraw this action, or that any other relief as the court deems just and proper, with cost of suit disbursement in this action.

Respectfully submitted



Oliver Zhou, Esq (OZ3684)  
LAW OFFICES OF OLIVER ZHOU  
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Attorney for Defendant In Rem


Dated: 7/7/2014

**VERIFICATION**

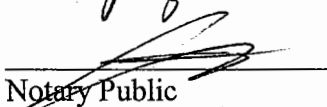
State of New York        }  
                                  ss:  
County of New York      }

The undersigned, being duly sworn, depose and say:

The undersigned has read the foregoing petition/statement. The contents of them are true and correct to deponent's own knowledge except as to the matters therein alleged upon information and belief, and as to those matters, deponent believes them to be true.

  
Wan Ching Yeung

Sworn to before me this 2nd  
day of July, 2014.

  
Notary Public

**OLIVER ZHOU**  
Notary Public, State of New York  
No. 02CH6271444  
Qualified in New York County  
Term Expires October 29, 2016

**VERIFICATION**

State of New York        }  
                                  ss:  
County of New York        }

The undersigned, being duly sworn, depose and say:

The undersigned has read the foregoing petition/statement. The contents of them are true and correct to deponent's own knowledge except as to the matters therein alleged upon information and belief, and as to those matters, deponent believes them to be true.

*LU A#1 JIN*

Haijin Lu

Sworn to before me this *2nd*  
day of *July*, 2014.

  
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Notary Public

**OLIVER ZHOU**  
Notary Public, State of New York  
No. 02CH6271444  
Qualified in New York County  
Term Expires October 29, 20*16*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of July 2014 a copy of the foregoing  
verified statement of interest was served on behalf of Wan Ching Yeung and Haijin  
Lu, via first-class mail upon:

Carolina A. Fornos  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2740



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New York, NY 10013  
Tel: (212) 226-9442

Dated: 7/7/2014